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*Proposed Attorneys for Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION BETWEEN DEBTORS  
AND OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS EXTENDING  
TIME TO RESPOND TO MOTIONS TO  
BE HEARD ON FEBRUARY 27, 2019**

[No Hearing Requested]

**STIPULATION TO EXTEND TIME FOR OCUC**

1 This stipulation and agreement for order (“Stipulation and Agreement for Order”) is  
2 entered into by PG&E Corporation (“PG&E Corp.”) and Pacific Gas and Electric Company (the  
3 “Utility”), as debtors and debtors in possession (collectively, the “Debtors”), on the one hand,  
4 and the Official Committee of Unsecured Creditors (the “Creditors Committee”). The Debtors  
5 and Creditors Committee are referred to in this Stipulation and Agreement for Order collectively  
6 as the “Parties,” and each as a “Party.” The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On February 6, 2019, the Debtors filed a notice of hearing [Dkt. 353] noticing  
9 sixteen (16) motions listed therein (the “Motions”) for a hearing before the Court at 9:30 a.m. on  
10 February 27, 2019.

11 B. Under Local Bankruptcy Rule 9014-1(c)(2), any opposition or response to the  
12 Motions must be filed and served on counsel for the Debtors no later than February 20, 2019.

13 C. The Office of the United States Trustee filed an Appointment of the Official  
14 Committee of Unsecured Creditors on February 12, 2019 [Dkt. 409].

15 D. On February 14, 2019, proposed counsel to the Creditors Committee requested,  
16 and proposed counsel for the Debtors agreed, that the time for the Creditors Committee to  
17 respond to the Motions be extended by two days.

18 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
19 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
20 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
21 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**  
22 **THAT:**

23 1. The time for the Creditors Committee to file and serve any response or  
24 opposition to the Motions is extended through February 22, 2019.

25 *[Signatures on Next Page]*  
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**STIPULATION TO EXTEND TIME FOR OCUC  
TO RESPOND TO MOTIONS**

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Dated: February 15, 2019  
KELLER & BENVENUTTI LLP

/s/ Tobias S. Keller  
Tobias S. Keller

*Proposed Attorneys for Debtors  
and Debtors in Possession*

Dated: February 15, 2019  
MILBANK, TWEED, HADLEY &  
McCLOY LLP

/s/ Thomas R. Kreller  
Thomas R. Kreller

*Proposed Attorneys for Official Committee  
of Unsecured Creditors*

STIPULATION TO EXTEND TIME FOR OCUC  
TO RESPOND TO MOTIONS